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July 8, 2016

**VIA ECF**

Hon. Magistrate Judge Henry B. Pitman  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 NYNY 10007

**Re: Fischer v. Forrest, et al**  
**Case No.: 14 cv 1304 and 14 cv 1307**

Dear Judge Pitman:

As counsel for all parties in the present lawsuit, we request an extension of all currently pending deadlines for 60 days. The current deadlines and requested extension of the deadlines are listed below:

Task	Current Deadline	Proposed Deadline
Fact Discovery Deadline	August 31, 2016	October 31, 2016
Identification of Plaintiff's Expert Witness	September 30, 2016	November 29, 2016
Identification of Defendants' Expert Witness	October 31, 2016	December 30, 2016
Rebuttal Expert's Due	November 18, 2016	January 17, 2017
Expert Discovery Deadline	December 31, 2016	March 1, 2017
Dispositive Motion Deadline	January 31, 2017	April 3, 2017
Settlement Conference Deadline	March 1, 2017	May 1, 2017

This request is not for delay or harassment. Instead, each party needs additional time to complete discovery in this matter and requests the remaining deadlines be extended in turn.

Thank you for your courtesy and attention in this matter.

Sincerely,

By:/s/ Seth L. Hudson

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